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15 -and-

16 **MORRISON & FOERSTER LLP**  
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26 *Attorneys for Enigma Securities Limited*

27 **UNITED STATES BANKRUPTCY COURT**

28 **DISTRICT OF NEVADA**

29 In re

30 Case No. BK-23-10423-mkn

31 CASH CLOUD, INC.,  
32 dba COIN CLOUD,

33 Chapter 11

34 Debtor.

35 **STIPULATION TO EXTEND CERTAIN  
36 DATES IN CONNECTION WITH  
37 SCHEDULING ORDER**

1 Enigma Securities Limited (“Enigma”), by and through its counsel Morrison & Foerster LLP  
2 and Shea Larsen; Cash Cloud, Inc. dba Coin Cloud (“Debtor”), debtor and debtor in possession in the  
3 above-captioned case (the “Chapter 11 Case”), by and through its counsel Fox Rothschild LLP; the  
4 Official Committee of Unsecured Creditors (the “Committee”), by and through its counsel Seward &  
5 Kissel LLP and McDonald Carano LLP; Genesis Global Holdco, LLC (“Genesis”), by and through  
6 its counsel Cleary Gottlieb Steen & Hamilton LLP and Snell & Wilmer L.L.P.; and AVT Nevada,  
7 L.P. (“AVT” and, together with Enigma, the Debtor, the Committee, and Genesis, the “Parties”), by  
8 and through its counsel Michael Best & Friedrich LLP, stipulate and agree as follows (the  
9 “Stipulation”):

## RECITALS

11       A.       WHEREAS, on February 7, 2023, Debtor filed a voluntary petition under chapter 11  
12 of title 11 of the United States Code in the United States Bankruptcy Court for the District of Nevada  
13 (the “Court”), commencing the Chapter 11 Case;

14        B.        WHEREAS, on July 24, 2023, the Debtor filed its *Motion for Entry of an Order*  
15 *Authorizing Debtor to Surcharge the Collateral of Genesis Global Holdco, LLC, Enigma Securities*  
16 *Limited, and AVT Nevada, L.P.* [Docket No. 926] (the “Surcharge Motion”);

17 C. WHEREAS, on August 4, 2023, Enigma filed the *Stipulation Regarding Scheduling*  
18 *of Dates in Connection with Enigma’s Administrative Expense Claim [Docket No. 873]*, Committee’s  
19 *Standing Motion [Docket No. 925]*, and Debtor’s Surcharge Motion [Docket No. 926] [Docket No.  
20 1026] (the “Scheduling Stipulation”) setting various dates and deadlines in connection with the  
21 Surcharge Motion, including the deadline to object to the Surcharge Motion (the “Objection  
22 Deadline”) and the deadline to file replies in support of the Surcharge Motion (the “Reply Deadline”);

23           D.       WHEREAS, on August 9, 2023, the Court entered an order approving the Scheduling  
24 Stipulation [Docket No. 1056] (the “Scheduling Order”) and setting a deadline of (i) August 30, 2023  
25 for the Objection Deadline and (ii) September 13, 2023 for the Reply Deadline;

26       E.       WHEREAS, the Parties wish to extend the Objection Deadline and the Reply Deadline  
27       to September 1, 2023 and September 15, 2023, respectively;

NOW, THEREFORE, the Parties hereby stipulate and agree to the following:

1 IT IS STIPULATED AND AGREED that:

2 1. The following dates shall apply with respect to the Surcharge Motion:

3 Event	4 Date
5 Deadline to object to Surcharge Motion	6 September 1, 2023
7 Deadline for replies in support of Surcharge Motion	8 September 15, 2023

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1 Dated this 24<sup>th</sup> day of August 2023.

2

3 **FOX ROTHSCHILD LLP**

4

5 By: /s/ Brett A. Axelrod

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14 *Counsel for Debtor*

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1 **SEWARD & KISSEL LLP**

2 By: /s/ Robert J. Gayda

3 John R. Ashmead, Esq.

4 Robert J. Gayda, Esq.

5 Catherine V. LoTempio, Esq.

6 Laura E. Miller, Esq.

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8 (*pro hac vice applications granted*)

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11 -and-

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18 *Unsecured Creditors*

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1                   **CLEARY GOTTLIEB STEEN &**  
2                   **HAMILTON LLP**

3                   By: /s/ Robert R. Kinas

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24                  *Counsel for Enigma Securities Limited*

**CERTIFICATE OF SERVICE**

On August 24, 2023, I served **STIPULATION TO EXTEND CERTAIN DATES IN CONNECTION WITH SCHEDULING ORDER** in the following manner:

a. ECF System: Under Administrative Order 02-1 (Rev. 8-31-04) of the United States Bankruptcy Court for the District of Nevada, the above-referenced document was electronically filed on the date hereof and served through the Notice of Electronic Filing automatically generated by the Court's facilities.

b. United States mail, postage fully prepaid:

c. Personal Service:

I personally delivered the document(s) to the persons at these addresses:

For a party represented by an attorney, delivery was made by handing the document(s) at the attorney's office with a clerk or other person in charge, or if no one is in charge by leaving the document(s) in a conspicuous place in the office.

For a party, delivery was made by handing the document(s) to the party or by leaving the document(s) at the person's dwelling house or usual place of abode with someone of suitable age and discretion residing there.

d. By direct email (as opposed to through the ECF System): Based upon the written agreement of the parties to accept service by email or a court order, I caused the document(s) to be sent to the persons at the email addresses listed below. I did not receive, within a reasonable time after the transmission, any electronic message or other indication that the transmission was unsuccessful.

e. By fax transmission:

Based upon the written agreement of the parties to accept service by fax transmission or a court order, I faxed the document(s) to the persons at the fax numbers listed below. No error was reported by the fax machine that I used. A copy of the record of the fax transmission is attached.

f. By messenger:

I served the document(s) by placing them in an envelope or package addressed to the persons at the addresses listed below and providing them to a messenger for service.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: August 24, 2023

By: /s/ Bart K. Larsen, Esq.

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